

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

CHRISTOPHER C. DAVIDSON,  
Plaintiff,

vs.

DEUTSCHE BANK SECURITIES, INC.,  
DEUTSCHE BANK AMERICAS  
HOLDING CORPORATION, and  
DEUTSCHE BANK AMERICAS  
SEVERANCE PAY PLAN,  
Defendants

Civil Action No. 1:04-cv-11027-RGS

**PLAINTIFF'S INITIAL DISCLOSURES**

Pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure and Local Rule 26.2(A), Plaintiff Christopher Davidson ("Davidson") makes the following initial disclosures to defendants Deutsche Bank Securities, Inc., Deutsche Bank Americas Holding Corporation, and Deutsche Bank Americas Severance Pay Plan (collectively, "defendants").

**A. Individuals Likely to Have Discoverable Information**

Based upon currently available information, Davidson believes that the individuals listed below are likely to have discoverable information on the following subjects: (a) Davidson's February 2001 Employment Letter; (b) documents governing and reflecting Davidson's incentive compensation and restricted equity units; and (c) Davidson's termination of employment at Deutsche Bank.

Peter Goldstein (signatory of Davidson's employment letter)  
Subjects a, b

Kristi Dugan (signatory of Davidson's employment letter)  
Subject a, b

Marilyn Albert  
Subject a, b, c

Meghan Marino  
Subject b, c

Christopher Davidson  
Subjects: a, b, c

Davidson may be reached through undersigned counsel.

**B. Documents**

The Plaintiff will likely use the following documents to support its positions in this action:

1. February 7, 2001 Employment Letter
2. Deutsche Bank's Restricted Equity Units Summary Plan Description
3. Deutsche Bank's Restricted Equity Units Plan
4. Deutsche Bank's Severance Plan

Each of the documents referenced above is appended to Davidson's complaint.

CHRISTOPHER C. DAVIDSON

CRAIG AND MACAULEY  
PROFESSIONAL CORPORATION

By his attorneys,

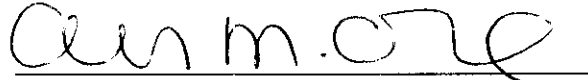
A handwritten signature in black ink, appearing to read "Allison M. O'Neil", is written over a horizontal line.

Peter I. Dunn (BBO# 641307)  
Allison M. O'Neil (BBO# 641330)  
Craig and Macauley  
Professional Corporation  
Federal Reserve Plaza  
600 Atlantic Avenue  
Boston, Massachusetts 02210  
(617) 367-9500

Dated: December 13, 2004

CERTIFICATE OF SERVICE

I, Allison M. O'Neill, hereby certify that a copy of the foregoing document was served by mailing same, postage prepaid, first class mail to Scott A. Roberts, Sullivan Weinstein & McQuay, P.C., Two Park Plaza, Suite 610, Boston, Massachusetts 02116-3902 on December 13, 2004.

  
Allison M. O'Neill